

Stamatios Stamoulis #01790-1999
Richard C. Weinblatt #01571-2001
STAMOULIS & WEINBLATT LLC
800 N. West Street, Third Floor
Wilmington, DE 19801
Telephone: (302) 999-1540
Facsimile: (302) 762-1688
stamoulis@swdelaw.com
weinblatt@swdelaw.com

Attorneys for Plaintiff
Adiona IP, LLC

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

ADIONA IP, LLC,)	
)	
Plaintiff,)	
)	Civil Action No. 2:19-cv-5670
v.)	
)	JURY TRIAL DEMANDED
SAKAR INTERNATIONAL, INC.,)	
)	
Defendant.)	
_____)	

COMPLAINT

For its Complaint, Adiona IP, LLC ("Adiona"), by and through the undersigned counsel, alleges as follows:

THE PARTIES

1. Adiona is a Texas limited liability company with a place of business located at 1400 Preston Road, Suite 400, Plano, Texas 75093

2. Defendant SAKAR International, Inc. is a New Jersey company with, upon information and belief, a place of business located at 195 Carter Drive, Edison, New Jersey 08817.

JURISDICTION AND VENUE

3. This action arises under the Patent Act, 35 U.S.C. § 1 *et seq.*

4. Subject matter jurisdiction is proper in this Court under 28 U.S.C. §§ 1331 and 1338.

5. Upon information and belief, Defendant conducts substantial business in this forum, directly or through intermediaries, including: (i) at least a portion of the infringements alleged herein; and (ii) regularly doing or soliciting business, engaging in other persistent courses of conduct and/or deriving substantial revenue from goods and services provided to individuals in this district.

6. Venue is proper in this district pursuant to § 1400(b).

THE PATENT-IN-SUIT

7. On March 20, 2007, U.S. Patent No. 7,194,520 (the "'520 patent"), entitled "Content Player for Broadcasting to Information Appliances," was duly and lawfully issued by the U.S. Patent and Trademark Office. A true and correct copy of the '520 patent is attached hereto as Exhibit A.

8. Adiona is the assignee and owner of the right, title and interest in and to the '520 patent, including the right to assert all causes of action arising under said patent and the right to any remedies for infringement of it.

COUNT I – INFRINGEMENT OF U.S. PATENT NO. 7,194,520

9. Adiona repeats and realleges the allegations of paragraphs 1 through 8 as if fully set forth herein.

10. Without license or authorization and in violation of 35 U.S.C. § 271(a), Defendant has infringed and continues to infringe at least claim 1 of the '520 patent by making, using,

importing, offering for sale, and/or selling, a content broadcaster, including, but not limited to, IMW789, IMT802 and IWM889 devices (collectively, "Accused Devices"), because each and every element is met either literally or equivalently.


11. Upon information and belief, Defendant used the Accused Devices via its internal use and testing in the United States, directly infringing one or more claims of the '520 patent.

12. For example, to create its quick start guides for Accused Devices, Defendant used the Accused Devices.

13. As another example, Defendant made and used the accused "content broadcaster" by testing or otherwise using two or more IMW789, IMT802, and IWM888 devices with a mobile device, laptop, or desktop computer to stream media content (e.g., a music album or playlist).

14. More specifically, the Accused Devices pair with a mobile device, laptop or desktop computer (i.e., a personal computer) configured to access and receive media content from a world wide network (e.g., from Apple Music, Deezer, Pandora, Spotify, Amazon Music, etc.). A mobile device, laptop, or desktop computer (i.e., personal computer) includes a processor (i.e., a controller), memory, a network connection device (e.g., a baseband processor, a network card, a Bluetooth radio), a display system (e.g., a display and associated hardware and software for controlling the display), and an input/output system (e.g., a touch screen and associated hardware and software for controlling the i/o system). The processor (e.g., controller) is configured to communicate with the memory, network connection device, display system, and input/output system via a system bus.

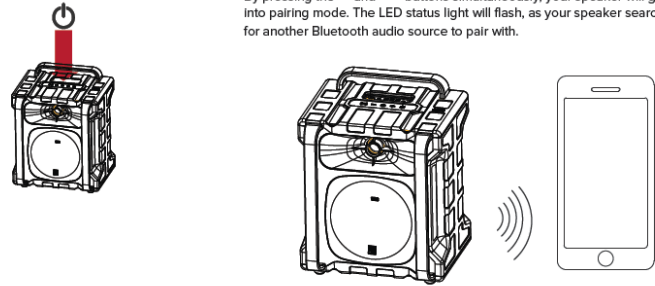
4. Power on your speaker. Go to the Bluetooth Manager of your Bluetooth device. Search Bluetooth devices and select "Sonic Boom" to start connecting.

When you power on your Sonic Boom speaker for the first time, it will automatically go into pairing mode. The LED status light on the  button will turn blue and flash as your speaker searches for a Bluetooth audio source to pair with.

Once you have successfully paired your speaker with a Bluetooth audio source, the LED status light will stop flashing and begin shining steadily while remaining blue.

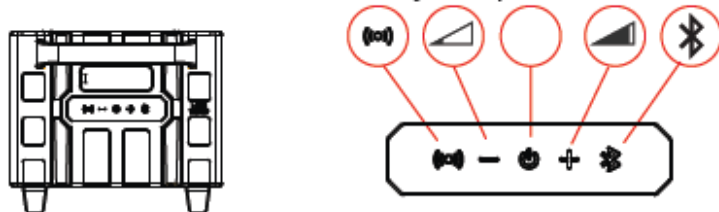
-Pairing Additional Bluetooth Smartphone Devices to your Sonic Boom Speaker






By pressing the "-" and "+" buttons simultaneously, your speaker will go back into pairing mode. The LED status light will flash, as your speaker searches for another Bluetooth audio source to pair with.



Sonic Boom Quick Start Guide ("Sonic Book Quick Start Guide") at p. 1 (available at http://www.alteclansing.com/wp-content/uploads/2017/06/802_IMT.pdf)

2. For a look at the various buttons on your speaker, view the graphic below.



Power On	Hold  for 2 Seconds
Power Off.....	Hold  for 2 Seconds
Play / Pause.....	Press 
Volume Up / Down.....	Press + or -
Pairing Mode / Disconnect Device....	Press - and +
Factory Reset.....	Hold - and + for 5 seconds
House Party Pairing.....	Hold  for 1-2 Seconds (master speaker)
	Tap  (slave speaker)
Next Track.....	Hold +
Previous Track.....	Hold -
Bass Boost.....	Press (to)

Id.

4. Pairing Your Speaker with a Bluetooth Device

-Powering on your LifeJacket XL Speaker and Entering Pairing Mode

When you power on your LifeJacket XL speaker for the first time, it will automatically go into pairing mode. The LED status light will flash rapidly as your speaker searches for a Bluetooth audio source to pair with.

-Pairing Your Speaker with a Bluetooth Phone

Once your speaker is powered on and in pairing mode, go to the Bluetooth settings menu, make sure that Bluetooth is turned on, and then select "LifeJacket XL" to pair.

Once you have successfully paired your speaker with a Bluetooth audio source, the LED status light will stop flashing rapidly, and begin shining steadily while remaining blue. In addition, your speaker will emit an audible tone to confirm that pairing was successful.

-Pairing Additional Bluetooth Devices to the LifeJacket XL Speaker

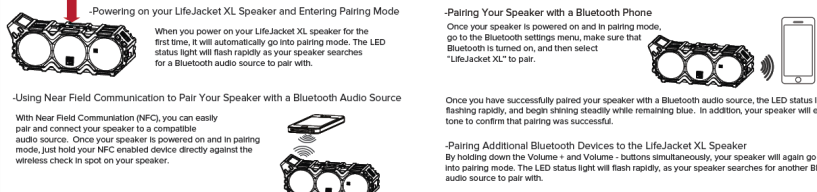

By holding down the Volume + and Volume - buttons simultaneously, your speaker will again go into pairing mode. The LED status light will flash rapidly, as your speaker searches for another Bluetooth audio source to pair with.

Note: Pairing mode times out in approximately three minutes.

5. By downloading the "ALTEC CONNECT" app (for iOS and Android) you can personalize your LifeJacket XL speaker.

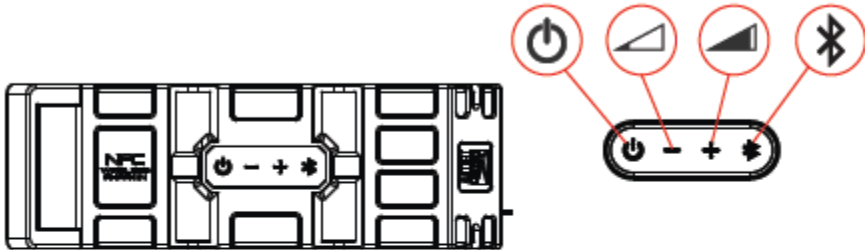
ALTEC CONNECT will allow you to:






- Enable the Stereo Plus Pairing setting
- Control Play/Pause/Skip/Volume/Mute
- Get over the air software updates
- Select EQ sound settings

LifeJacket XL Quick Start Guide ("LifeJacket XL Quick Start Guide") at p. 1 (available at http://www.alteclansing.com/wp-content/uploads/2017/06/789_IMW.pdf).

2. For a look at the various buttons on your speaker, view the graphic below.




Power On.....	Hold  for 2 Second
Power Off.....	Hold  for 2 Seconds
Play / Pause.....	Press 
Volume Up / Down.....	Press + or -
Pairing Mode / Disconnect Device....	Hold + and -
Answer / End Call.....	Press 
Stereo Plus Pairing.....	Hold  for 2 Seconds
Next Track.....	Hold +
Previous Track.....	Hold -

Id.

4. Pairing Your Speaker with a Bluetooth Device


-Pairing the Super Life Jacket Speaker with a Bluetooth Device for the First Time
When you power on your Super Life Jacket speaker for the first time, it will automatically go into pairing mode. The LED status light will flash rapidly as your speaker searches for a Bluetooth audio source to pair with.

Once you have successfully paired your speaker with a Bluetooth audio source, the LED status light will stop flashing rapidly, and begin shining steadily while remaining blue. In addition, your speaker will emit an audible tone to confirm that pairing was successful.


-Pairing Additional Bluetooth Devices to the Super Life Jacket Speaker
By pressing the Bluetooth Button () your speaker will again go into pairing mode. The LED status light will flash rapidly, as your speaker searches for another Bluetooth audio source to pair with.

* Pairing mode times out in 10 minutes.

5. Pair the Speaker Using NFC
With Near Field Communication (NFC), you can easily pair and connect your speaker to your compatible device. Just hold your NFC enabled device directly against the wireless check in spot on your speaker.

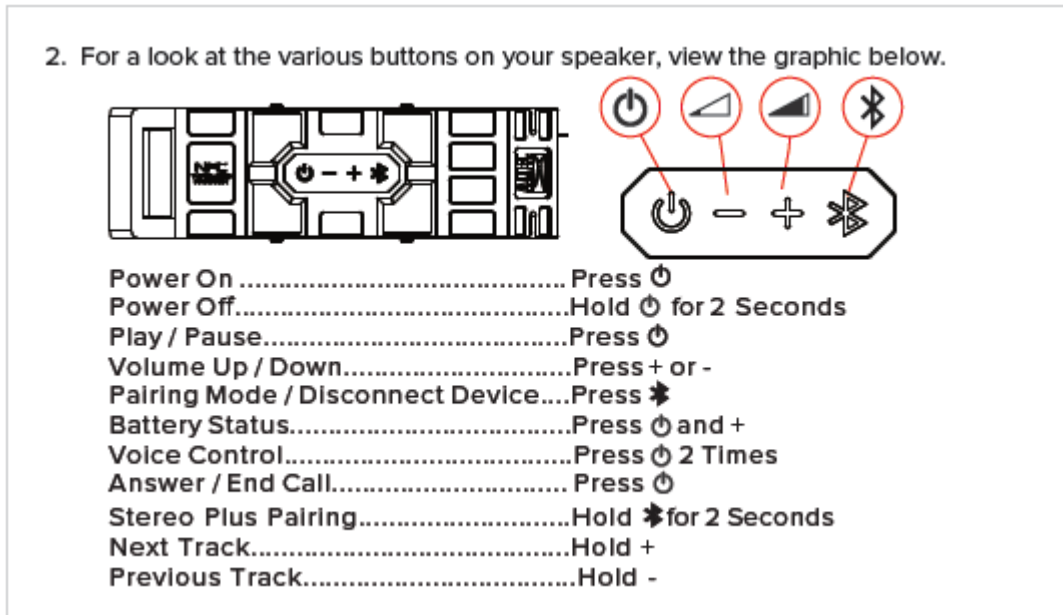


or



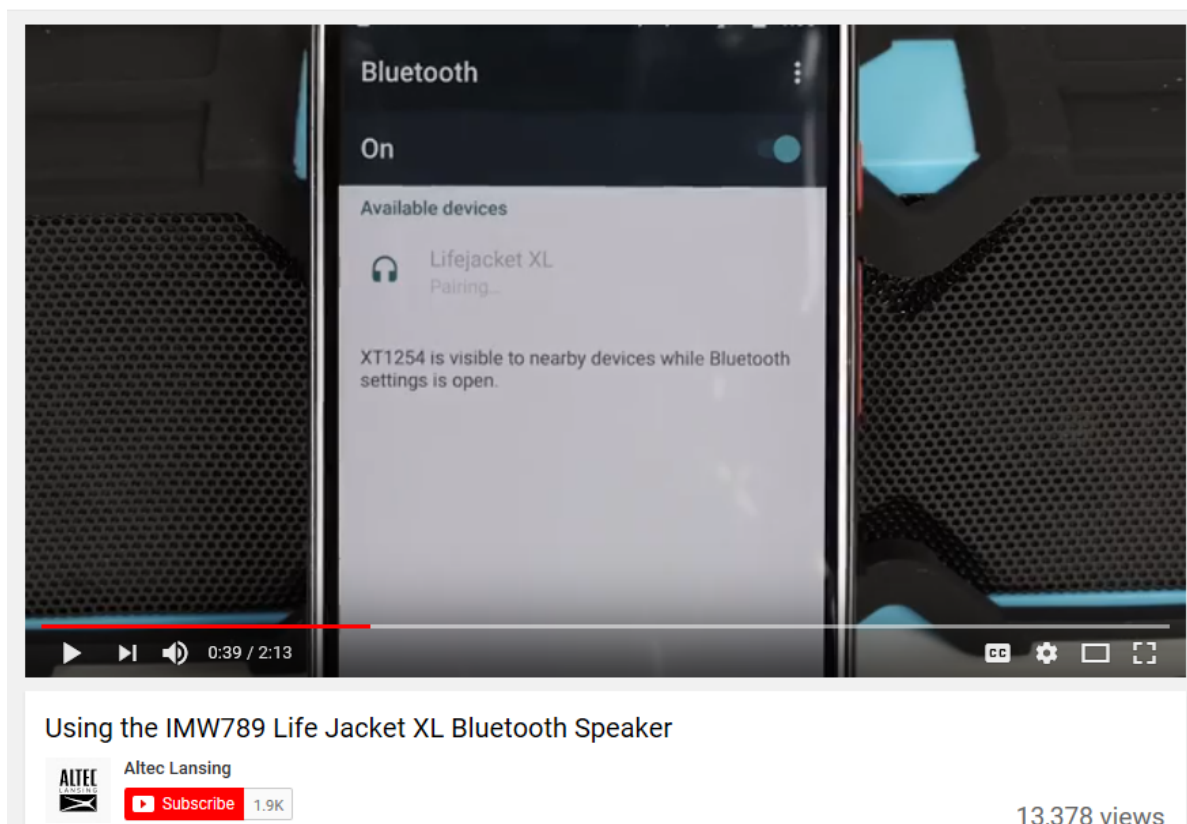
Power on your speaker. Go to the Bluetooth Manager of your Bluetooth device. Search Bluetooth devices and select "SUPER LIFE JACKET" to start connecting.

Super LifeJacket Quick Start Guide ("Super LifeJacket Quick Start Guide") at p. 1 (available at http://www.alteclansing.com/wp-content/uploads/2017/06/888_IMW.pdf).



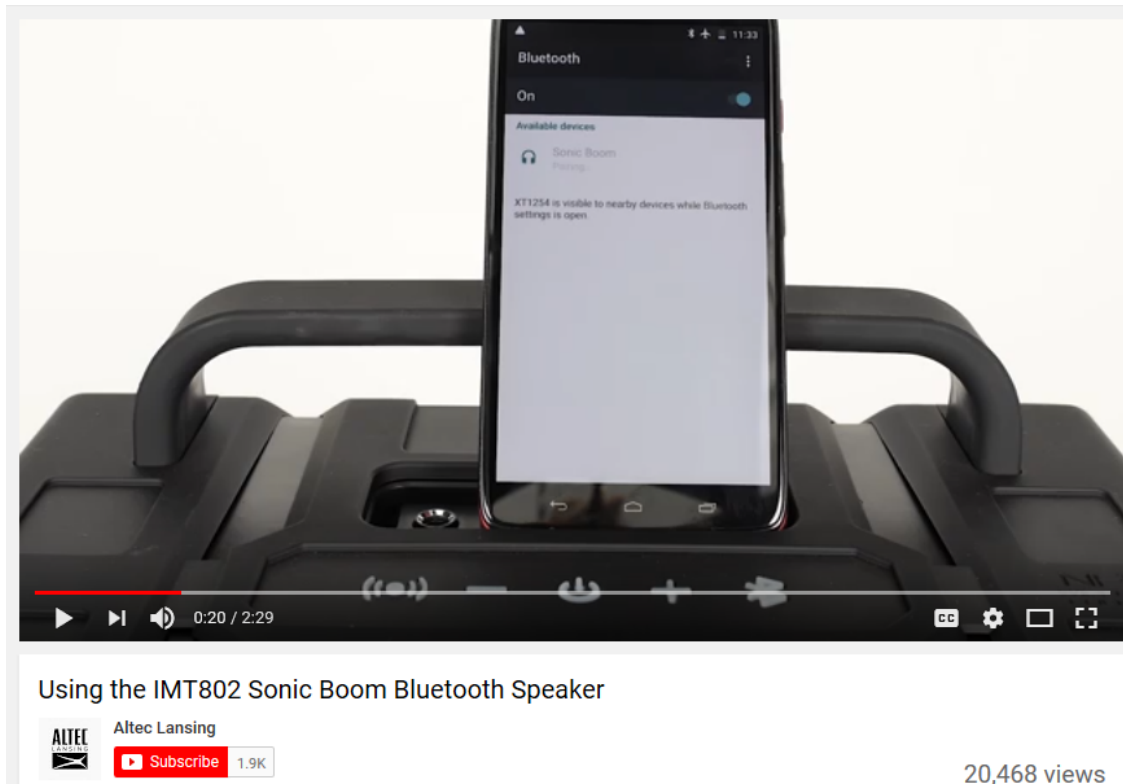
Id.

15. Below is an image from a video created by Defendant showing Defendant connecting a computing device to the IMW789 device via Bluetooth:



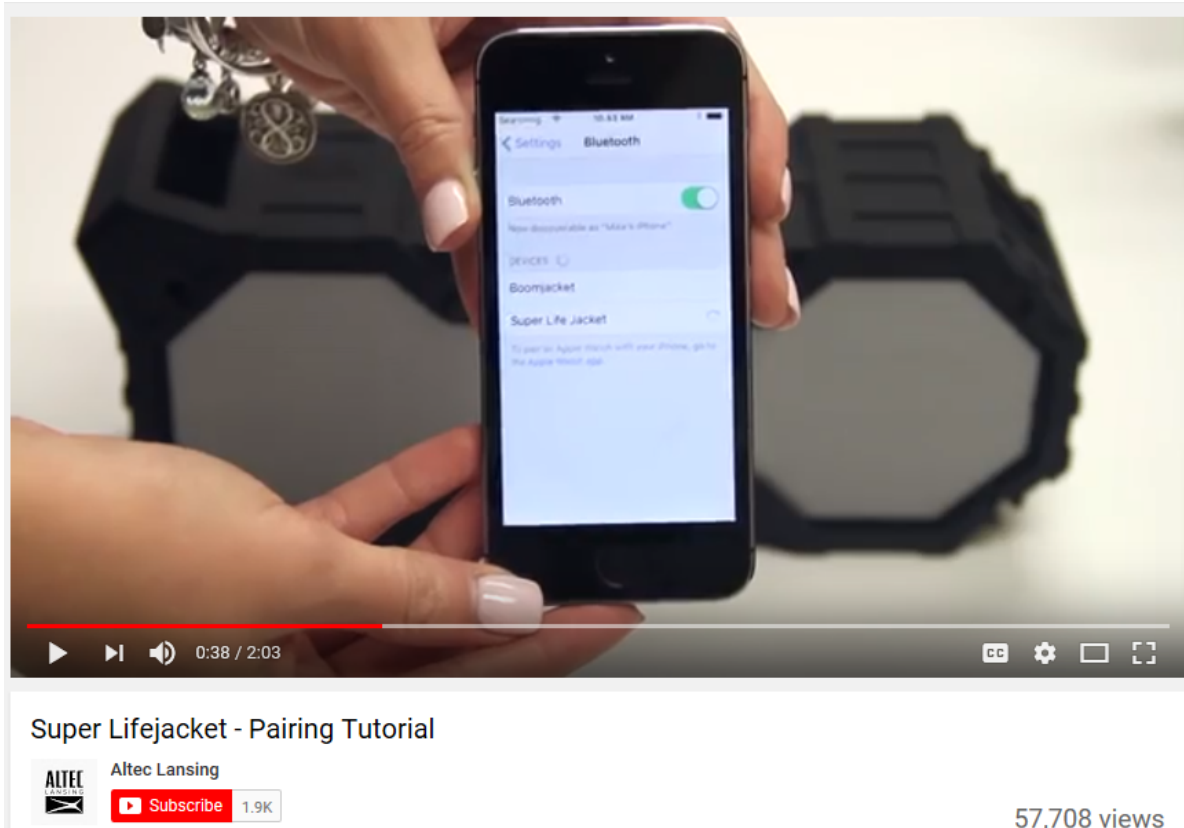
<https://www.youtube.com/watch?v=HdI1oY3X2HQ>.

16. Below is an image from a video created by Defendant showing Defendant connecting a computing device to the IMT802 via Bluetooth:



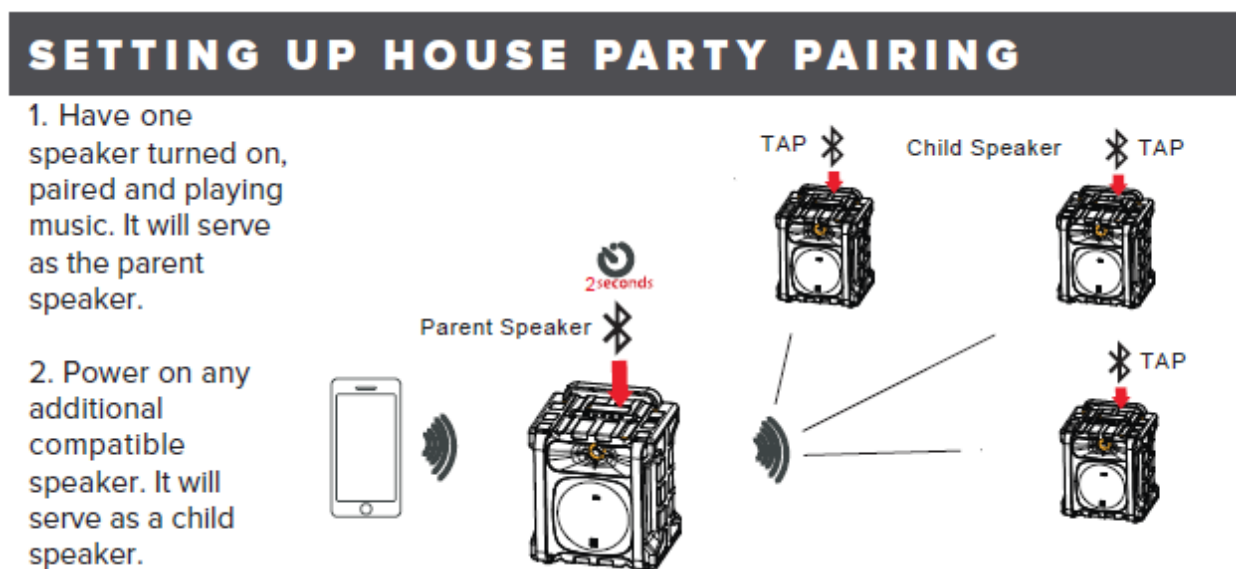
<https://www.youtube.com/watch?v=qql2rk1EqLA>.

17. Below is an image from a video created by Defendant showing Defendant connecting a computing device to the IWM888 via Bluetooth:



<https://www.youtube.com/watch?v=Ogt8wd3Fdno>.

18. Defendant advertises that each Accused Devices (i.e., information appliance) can be paired with multiple Accused Devices (i.e., information appliances).

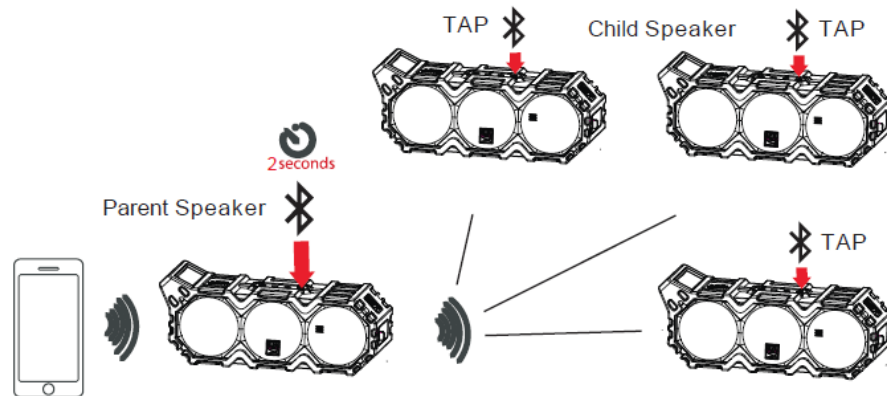


House Party Pairing Mode (available at <http://alteclansing.com/wp-content/uploads/2017/09/House-Party-Guide-for-IMT802.pdf>).

SETTING UP HOUSE PARTY PAIRING

1. Have one speaker turned on, paired and playing music. It will serve as the parent speaker.

2. Power on any additional compatible speaker. It will serve as a child speaker.



House Party Pairing Mode (available at <http://alteclansing.com/wp-content/uploads/2017/09/House-Party-Guide-for-IMW789.pdf>).

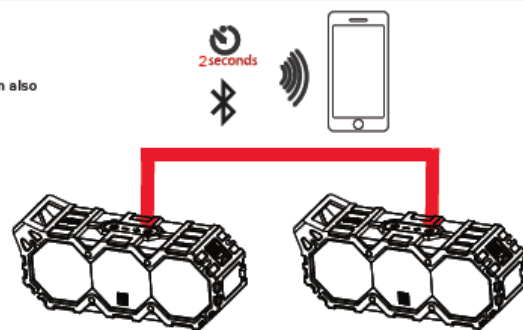
7. Using the Stereo Plus Pairing Feature

The Stereo Plus Pairing feature allows you to connect two Super Life Jacket speakers together for a bigger, more powerful sound.

The Stereo Plus Pairing feature can be accessed through the Altec Connect app, but you can also use it without the app. To do so, follow the steps below:

1. Have one Super Life Jacket speaker turned on, paired and playing music.
2. Power on your second Super Life Jacket speaker.
3. Press and hold the Bluetooth buttons on both speakers at the same time for two seconds.

The two connected speakers will now play the same music from the same device.



Super LifeJacket Quick Start Guide at p. 1.

What is House Party Mode?

House Party Mode is the newest feature on select Altec Lansing speakers. It is the pairing setting that enables you to connect up to 50 speakers at once. This can be used to create a multi-room surround sound experience. You will have a parent speaker and multiple child speakers simultaneously playing music, creating the ultimate house party.

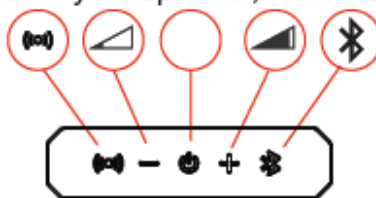
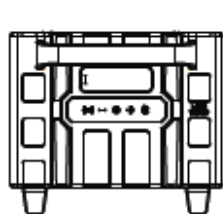
The following speakers are enabled with House Party Pairing:







IMW789
IMT802
IWM888s

<http://alteclansingsupport.com/faq/>.

19. The Accused Devices are information appliances configured to communicate with a mobile device, laptop, or desktop computer (i.e., a personal computer) via Bluetooth (i.e., a bi-directional communication link). The Accused Devices receive communications (e.g., music information) and sends communications (e.g., play/pause/next track/previous track).

2. For a look at the various buttons on your speaker, view the graphic below.



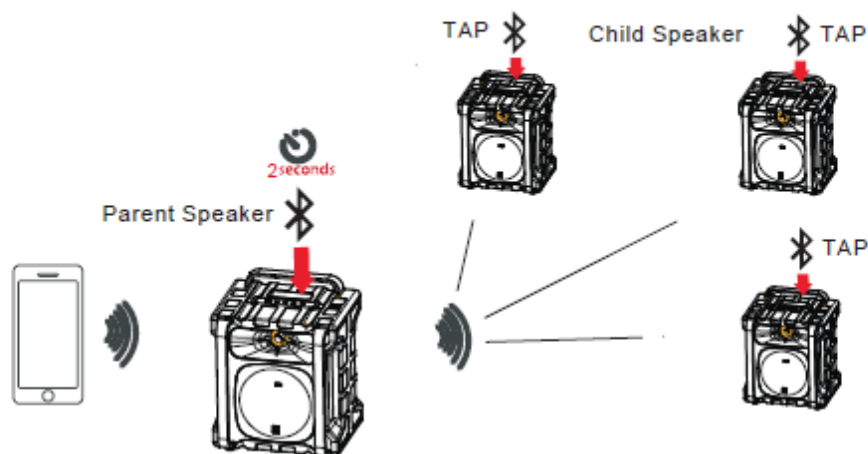
Power On	Hold  for 2 Seconds
Power Off.....	Hold  for 2 Seconds
Play / Pause.....	Press 
Volume Up / Down.....	Press + or -
Pairing Mode / Disconnect Device....	Press - and +
Factory Reset.....	Hold - and + for 5 seconds
House Party Pairing.....	Hold  for 1-2 Seconds (master speaker)
	Tap  (slave speaker)
Next Track.....	Hold +
Previous Track.....	Hold -
Bass Boost.....	Press 

Sonic Boom Quick Start Guide at p. 1.

SETTING UP HOUSE PARTY PAIRING

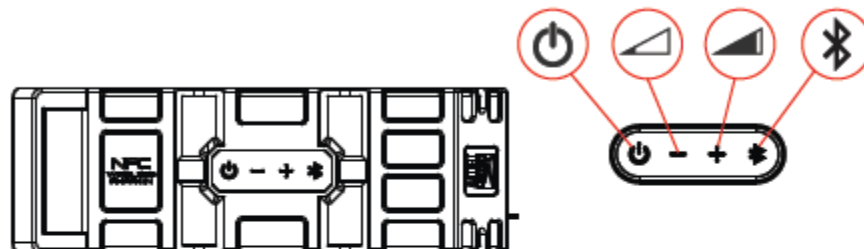
1. Have one speaker turned on, paired and playing music. It will serve as the parent speaker.






2. Power on any additional compatible speaker. It will serve as a child speaker.



House Party Pairing Mode (available at <http://alteclansing.com/wp-content/uploads/2017/09/House-Party-Guide-for-IMT802.pdf>).

2. For a look at the various buttons on your speaker, view the graphic below.



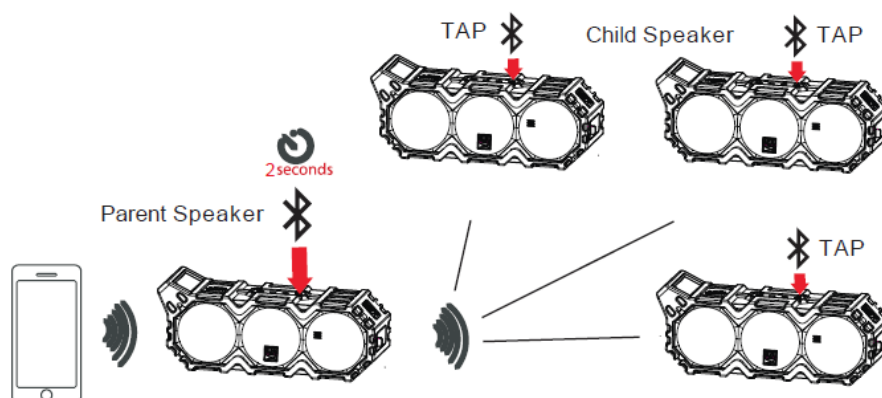
Power On.....	Hold  for 2 Second
Power Off.....	Hold  for 2 Seconds
Play / Pause.....	Press 
Volume Up / Down.....	Press + or -
Pairing Mode / Disconnect Device....	Hold+ and -
Answer / End Call.....	Press 
Stereo Plus Pairing.....	Hold  for 2 Seconds
Next Track.....	Hold +
Previous Track.....	Hold -

LifeJacket XL Quick Start Guide at p. 1.

SETTING UP HOUSE PARTY PAIRING

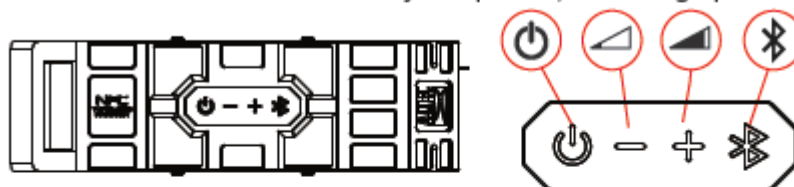
1. Have one speaker turned on, paired and playing music. It will serve as the parent speaker.

2. Power on any additional compatible speaker. It will serve as a child speaker.



House Party Pairing Mode (available at <http://alteclansing.com/wp-content/uploads/2017/09/House-Party-Guide-for-IMW789.pdf>).

2. For a look at the various buttons on your speaker, view the graphic below.



Power On	Press
Power Off.....	Hold for 2 Seconds
Play / Pause.....	Press
Volume Up / Down.....	Press + or -
Pairing Mode / Disconnect Device....	Press
Battery Status.....	Press and +
Voice Control.....	Press 2 Times
Answer / End Call.....	Press
Stereo Plus Pairing.....	Hold for 2 Seconds
Next Track.....	Hold +
Previous Track.....	Hold -

Super LifeJacket Quick Start Guide at p. 1.

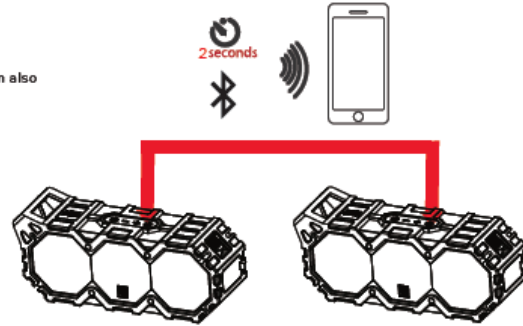
7. Using the Stereo Plus Pairing Feature

The Stereo Plus Pairing feature allows you to connect two Super Life Jacket speakers together for a bigger, more powerful sound.

The Stereo Plus Pairing feature can be accessed through the Altec Connect app, but you can also use it without the app. To do so, follow the steps below:

1. Have one Super Life Jacket speaker turned on, paired and playing music.
2. Power on your second Super Life Jacket speaker.
3. Press and hold the Bluetooth buttons on both speakers at the same time for two seconds.

The two connected speakers will now play the same music from the same device.



Id.

20. The mobile device (i.e., personal computer) is configured to broadcast media content (e.g., a music playlist) to the Accused Devices (i.e., information appliance) via Bluetooth (i.e., the bi-directional communication link).

4. Power on your speaker. Go to the Bluetooth Manager of your Bluetooth device. Search Bluetooth devices and select "Sonic Boom" to start connecting.

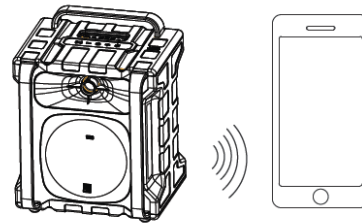
When you power on your Sonic Boom speaker for the first time, it will automatically go into pairing mode. The LED status light on the  button will turn blue and flash as your speaker searches for a Bluetooth audio source to pair with.

Once you have successfully paired your speaker with a Bluetooth audio source, the LED status light will stop flashing and begin shining steadily while remaining blue.



-Pairing Additional Bluetooth Smartphone Devices to your Sonic Boom Speaker

By pressing the "-" and "+" buttons simultaneously, your speaker will go back into pairing mode. The LED status light will flash, as your speaker searches for another Bluetooth audio source to pair with.



Sonic Boom Quick Start Guide at p. 1.

4. Pairing Your Speaker with a Bluetooth Device

-Powering on your LifeJacket XL Speaker and Entering Pairing Mode
When you power on your LifeJacket XL speaker for the first time, it will automatically go into pairing mode. The LED status light will flash rapidly as your speaker searches for a Bluetooth audio source to pair with.

-Using Near Field Communication to Pair Your Speaker with a Bluetooth Audio Source
With Near Field Communication (NFC), you can easily pair and connect your speaker to a compatible audio source. Once your speaker is powered on and in pairing mode, just hold your NFC enabled device directly against the wireless check in spot on your speaker.



-Pairing Your Speaker with a Bluetooth Phone
Once your speaker is powered on and in pairing mode, go to the Bluetooth settings menu, make sure that Bluetooth is turned on, and then select "LifeJacket XL" to pair.

Once you have successfully paired your speaker with a Bluetooth audio source, the LED status light will stop flashing rapidly, and begin shining steadily while remaining blue. In addition, your speaker will emit an audible tone to confirm that pairing was successful.

-Pairing Additional Bluetooth Devices to the LifeJacket XL Speaker
By holding down the Volume + and Volume - buttons simultaneously, your speaker will again go into pairing mode. The LED status light will flash rapidly, as your speaker searches for another Bluetooth audio source to pair with.

Note: Pairing mode times out in approximately three minutes.

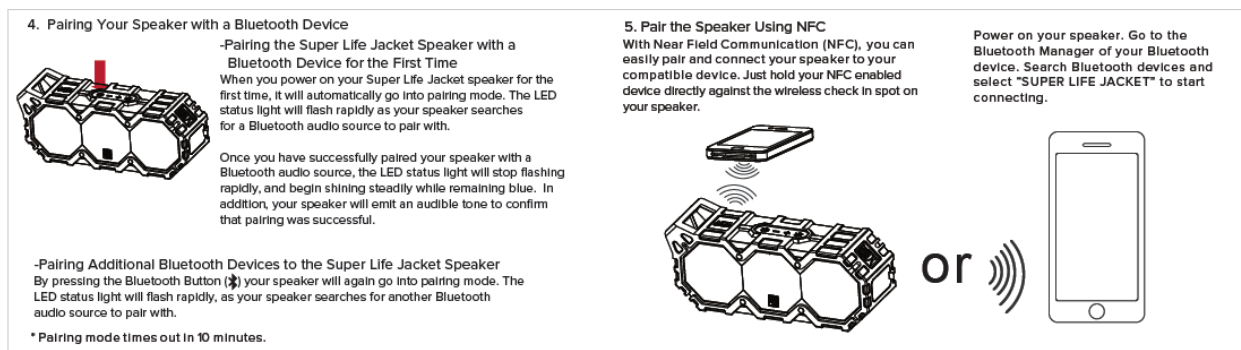


5. By downloading the "ALTEC CONNECT" app (for iOS and Android) you can personalize your LifeJacket XL speaker.

ALTEC CONNECT will allow you to:
-Enable the Stereo Plus Pairing setting
-Control Play/Pause/Skip/Volume/Mute
-Get over the air software updates
-Select EQ sound settings

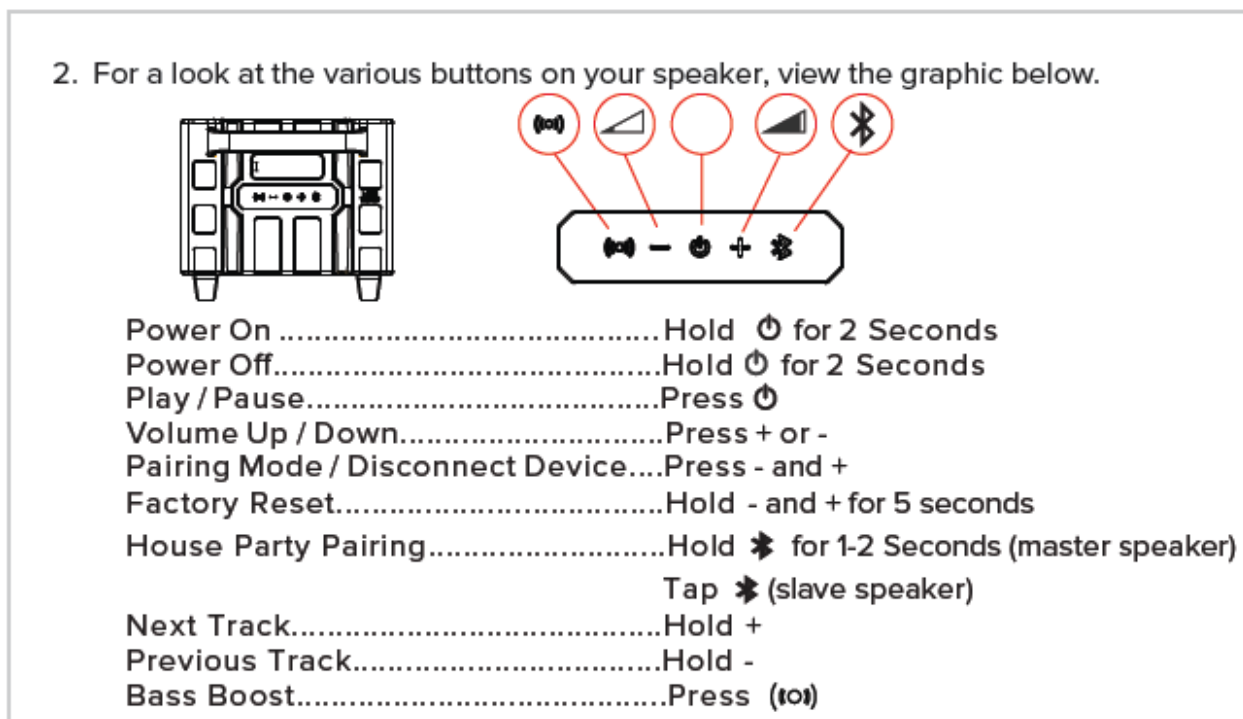


LifeJacket XL Quick Start Guide at p. 1.



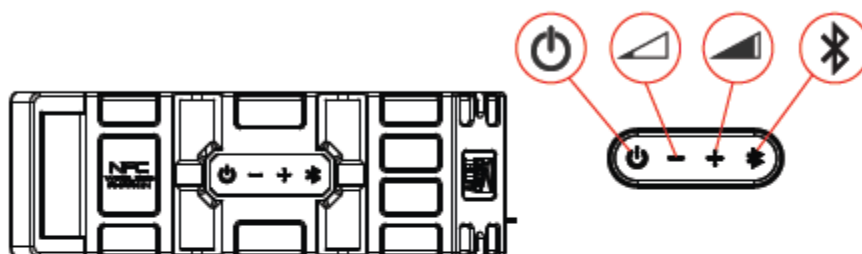
Super LifeJacket Quick Start Guide at p. 1.






21. The Accused Devices (i.e., information appliances) are configured to transmit control signals (e.g., play, pause, skip track) to the mobile device (i.e., personal computer) via Bluetooth (i.e., the bi-directional communication link). The control signals (e.g., play, pause, skip track) command the processor (i.e., controller) to broadcast a specified portion of the media content (e.g., a specific music track in a playlist) to a plurality of Accused Devices paired to the mobile device (i.e., personal computer).



Sonic Boom Quick Start Guide at p. 1.

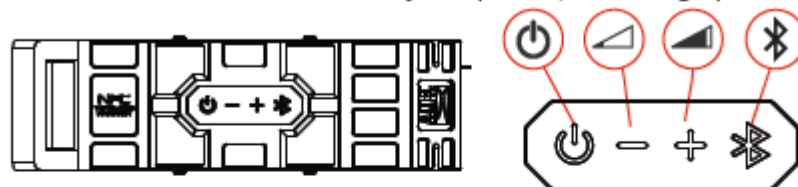
2. For a look at the various buttons on your speaker, view the graphic below.











Power On.....	Hold  for 2 Second
Power Off.....	Hold  for 2 Seconds
Play / Pause.....	Press 
Volume Up / Down.....	Press + or -
Pairing Mode / Disconnect Device....	Hold + and -
Answer / End Call.....	Press 
Stereo Plus Pairing.....	Hold  for 2 Seconds
Next Track.....	Hold +
Previous Track.....	Hold -

LifeJacket XL Quick Start Guide at p. 1.

2. For a look at the various buttons on your speaker, view the graphic below.



Power On	Press 
Power Off.....	Hold  for 2 Seconds
Play / Pause.....	Press 
Volume Up / Down.....	Press + or -
Pairing Mode / Disconnect Device....	Press 
Battery Status.....	Press  and +
Voice Control.....	Press  2 Times
Answer / End Call.....	Press 
Stereo Plus Pairing.....	Hold  for 2 Seconds
Next Track.....	Hold +
Previous Track.....	Hold -

Super LifeJacket Quick Start Guide at p. 1.

22. Defendants advertises that Accused Devices can be located in a different room.

What is House Party Mode?

House Party Mode is the newest feature on select Altec Lansing speakers. It is the pairing setting that enables you to connect up to 50 speakers at once. This can be used to create a multi-room surround sound experience. You will have a parent speaker and multiple child speakers simultaneously playing music, creating the ultimate house party.

The following speakers are enabled with House Party Pairing:


IMW789
IMT802
IWM888s

<http://alteclansingsupport.com/faq/>.


23. The Accused Devices include a Bluetooth radio.

24. Bluetooth is a wireless communication technology that uses adaptive frequency-hopping spread spectrum, a specific type of frequency-hopping spread spectrum, for wireless data transfer.

4. Power on your speaker. Go to the Bluetooth Manager of your Bluetooth device. Search Bluetooth devices and select "Sonic Boom" to start connecting.

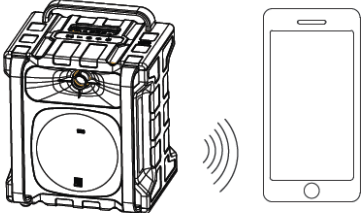
When you power on your Sonic Boom speaker for the first time, it will automatically go into pairing mode. The LED status light on the  button will turn blue and flash as your speaker searches for a Bluetooth audio source to pair with.

Once you have successfully paired your speaker with a Bluetooth audio source, the LED status light will stop flashing and begin shining steadily while remaining blue.



-Pairing Additional Bluetooth Smartphone Devices to your Sonic Boom Speaker

By pressing the "-" and "+" buttons simultaneously, your speaker will go back into pairing mode. The LED status light will flash, as your speaker searches for another Bluetooth audio source to pair with.



Sonic Boom Quick Start Guide at p. 1.


4. Pairing Your Speaker with a Bluetooth Device

-Powering on your LifeJacket XL Speaker and Entering Pairing Mode

When you power on your LifeJacket XL speaker for the first time, it will automatically go into pairing mode. The LED status light will flash rapidly as your speaker searches for a Bluetooth audio source to pair with.

-Using Near Field Communication to Pair Your Speaker with a Bluetooth Audio Source

With Near Field Communication (NFC), you can easily pair and connect your speaker to a compatible audio source. Once your speaker is powered on and in pairing mode, just hold your NFC enabled device directly against the wireless check in spot on your speaker.



-Pairing Your Speaker with a Bluetooth Phone


Once your speaker is powered on and in pairing mode, go to the Bluetooth settings menu, make sure that Bluetooth is turned on, and then select "LifeJacket XL" to pair.

Once you have successfully paired your speaker with a Bluetooth audio source, the LED status light will stop flashing rapidly, and begin shining steadily while remaining blue. In addition, your speaker will emit an audible tone to confirm that pairing was successful.

-Pairing Additional Bluetooth Devices to the LifeJacket XL Speaker

By holding down the Volume + and Volume - buttons simultaneously, your speaker will again go into pairing mode. The LED status light will flash rapidly, as your speaker searches for another Bluetooth audio source to pair with.


Note: Pairing mode times out in approximately three minutes.



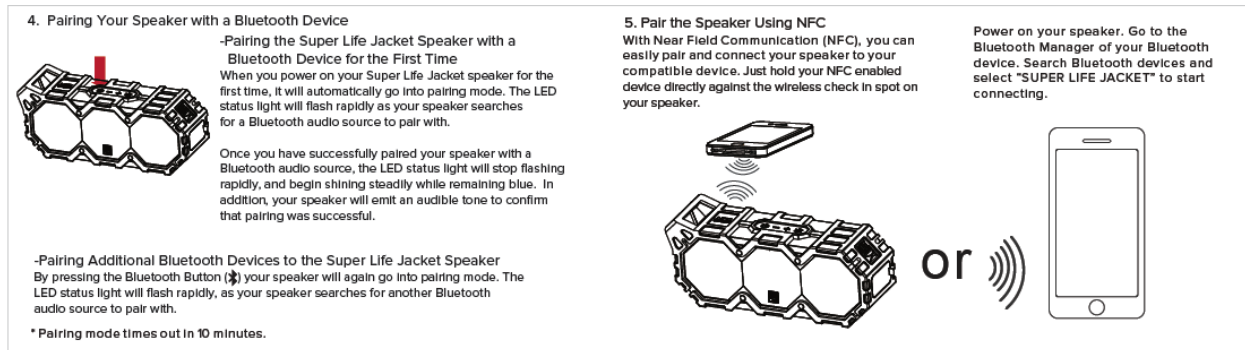
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LifeJacket XL Quick Start Guide at p. 1.



Super LifeJacket Quick Start Guide at p. 1.

25. Adiona is entitled to recover from Defendant the damages sustained by Adiona as a result of Defendant's infringement of the '520 patent in an amount subject to proof at trial, which, by law, cannot be less than a reasonable royalty, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

JURY DEMAND

Adiona hereby demands a trial by jury on all issues so triable.

PRAYER FOR RELIEF

WHEREFORE, Adiona requests that this Court enter judgment against Defendant as follows:

- A. An adjudication that Defendant has infringed the '520 patent;
- B. An award of damages to be paid by Defendant adequate to compensate Adiona for Defendant's past infringement of the '520 patent and any continuing or future infringement through the date such judgment is entered, including interest, costs, expenses and an accounting of all infringing acts including, but not limited to, those acts not presented at trial;
- C. A declaration that this case is exceptional under 35 U.S.C. § 285, and an award of Adiona's reasonable attorneys' fees; and

D. An award to Adiona of such further relief at law or in equity as the Court deems just and proper.

Respectfully submitted,

Dated: February 13, 2019

/s/ Richard C. Weinblatt
Stamatios Stamoulis #01790-1999
Richard C. Weinblatt #01571-2001
STAMOULIS & WEINBLATT LLC
800 N. West Street, Third Floor
Wilmington, DE 19801
Telephone: (302) 999-1540
Facsimile: (302) 762-1688
stamoulis@swdelaw.com
weinblatt@swdelaw.com

Attorneys for Plaintiff
Adiona IP, LLC